

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

BLACK EMERGENCY RESPONSE  
TEAM, et al.,

*Plaintiffs,*

v.

GENTNER DRUMMOND, in his official capacity as Oklahoma Attorney General, et al.,

*Defendants.*

Case No. 5:21-CV-1022-G

Hon. Charles B. Goodwin

**STIPULATION OF VOLUNTARY DISMISSAL**

**PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 41(a)(1)(A)(ii)**

Pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii),<sup>1</sup> it is hereby stipulated and agreed to by and between Plaintiffs, OU Defendants, and State Defendants (collectively, “Parties”) that the equal protection claim (Count IV of the Amended Complaint, Doc. 50) brought by Plaintiff NAACP-Oklahoma against members of the University of Oklahoma Board of Regents<sup>2</sup> is voluntarily dismissed without prejudice in the above-captioned action. Plaintiff NAACP-Oklahoma only voluntarily dismisses its equal protection claim against members of the University of Oklahoma Board of Regents, and Plaintiff NAACP-Oklahoma will continue to prosecute its equal protection claim as to all other Defendants. Plaintiffs S.L.

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<sup>1</sup> In the alternative, Parties respectfully request that the Court construe this Stipulation of Voluntary Dismissal as a Notice of Amended Complaint, pursuant to Fed. R. Civ. P. 15(a)(2).

<sup>2</sup> Current OU Board of Regents members are Bob Ross, Rick Braught, Kenneth Waits, Rainey Williams Jr., Eric Stevenson, Anita Holloway, and Rick Nagel.

and AIM Indian Territory, who are also parties to Count IV but who have not asserted claims against the OU Defendants, will also continue to prosecute Count IV as to all other Defendants.

Date: June 30, 2025

Respectfully submitted,

/s/ Maya Brodziak

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**CERTIFICATE OF SERVICE**

I hereby certify that on June 30, 2025, I electronically filed the foregoing Stipulation of Voluntary Dismissal with the Clerk of Court via the Court's CM/ECF system, which effects service upon all counsel of record.

Respectfully submitted,

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